

**FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JENNIFER FOLAN, ET AL.,

Plaintiffs,

v.

OPTION CARE HEALTH, INC.,

Defendant.

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Case No. 21-CV-03385

Magistrate Judge Gabriel A. Fuentes

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
COLLECTIVE AND CLASS ACTION SETTLEMENT AGREEMENT, FOR
APPROVAL OF SETTLEMENT NOTICE, AND FOR SCHEDULING OF FINAL
APPROVAL HEARING**

For the reasons stated in their accompanying Memorandum of Law, Named Plaintiffs and Class Representatives Jennifer Folan and Robin Allen, move this Court to enter their Proposed Order and: (1) grant preliminary approval of their Collective and Class Action Settlement Agreement; (2) certify the proposed FLSA Settlement Class and the Illinois Settlement Class for settlement purposes; (3) appoint Plaintiffs' Counsel as Class Counsel; (4) appoint Rust Consulting, Inc. as the Settlement Administrator; (5) approve the proposed Court-Authorized Notice of Settlement; and (6) set the date for the Final Approval Hearing. Defendant Option Care Health, Inc. does not oppose this Motion and/or the certification of the class for the limited purpose of settlement.¹

Date: December 22, 2021

Respectfully submitted,

/s/Logan A. Pardell

Logan A. Pardell*

Gregg I. Shavitz**

¹ Defendant Option Care Health, Inc. expressly reserves the right to oppose class certification, if the Settlement is unexpectedly not approved by the Court.

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*Attorneys for Plaintiffs, the FLSA Collective and
Illinois Class*

* *pro hac vice admitted*

***pro hac vice application forthcoming*